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Attorneys for Plaintiffs

L.C., I.H., A.L., and Antonia Salas Ubaldo

**UNITED STATES DISTRICT COURT FOR THE
CENTRAL DISTRICT OF CALIFORNIA**

L.C., a minor by and through her
guardian *ad litem* Maria Cadena,
individually and as successor-in-interest
to Hector Puga; I.H., a minor by and
through his guardian *ad litem* Jasmine
Hernandez, individually and as
successor-in-interest to Hector Puga;
A.L., a minor by and through her
guardian *ad litem* Lydia Lopez,
individually and as successor-in-interest
to Hector Puga; and ANTONIA SALAS
UBALDO, individually;

Plaintiffs,

vs.

STATE OF CALIFORNIA; COUNTY
OF SAN BERNARDINO; S.S.C., a
nominal defendant; ISIAAH KEE;
MICHAEL BLACKWOOD;
BERNARDO RUBALCAVA; ROBERT
VACCARI; JAKE ADAMS; and DOES
6-10, inclusive,

Defendants.

Case No. 5:22-cv-00949-KK-SHK

Honorable Kenly Kiya Kato

DECLARATION OF HANG D. LE

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I, Hang D. Le, declare as follows:

1. I am an attorney duly licensed to practice law in the State of California, and the Central District of California. I make this declaration in support of Plaintiff's Consolidated Opposition to Defendants' Motions for Summary Judgment. I have personal knowledge of the facts contained herein and could testify competently thereto if called.

2. Attached hereto as "**Exhibit 1**" is a true and correct copy of the relevant portions of the November 5, 2024 Deposition of Isaiah Kee.

3. Attached hereto as "**Exhibit 2**" is a true and correct copy of the relevant portions of the November 4, 2025 Deposition of Bernardo Rubalcava.

4. Attached hereto as "**Exhibit 3**" is a true and correct copy of the relevant portions of the November 4, 2024 Deposition of Michael Blackwood.

5. Attached hereto as "**Exhibit 4**" is a true and correct copy of the relevant portions of the November 12, 2024 Deposition of Jake Adams.

6. Attached hereto as "**Exhibit 5**" is a true and correct copy of the relevant portions of the November 14, 2024 Deposition of Robert Vaccari.

7. "**Exhibit 6**" is a true and correct copy of the relevant portions of the transcribed March 3, 2021 interview of Robert Vaccari. This exhibit is subject to a stipulated protective order and is being conditionally lodged under seal.

8. Attached hereto as "**Exhibit 7**" is a true and correct copy of the relevant portions of the November 25, 2024 Deposition of Erin Mangerino.

9. Attached hereto as "**Exhibit 8**" is a true and correct copy of the relevant portions of the December 30, 2024 Deposition of Betzabeth Gonzalez. This exhibit is being manually filed.

10. "**Exhibit 9**" is a true and correct copy of a cellphone video of the incident taken by witness Edward Mangerino, produced by County Defendants in

1 the course of discovery, bates stamped COSB001459. This exhibit is subject to a
2 stipulated protective order and is being conditionally lodged under seal.

3 11. “**Exhibit 10**” is a true and correct copy of a cellphone video of the
4 incident taken by witness Erin Mangerino, authenticated by Ms. Mangerino at her
5 November 25, 2024 Deposition. This exhibit is being manually filed.

6 12. “**Exhibit 11**” is a true and correct copy of the dashcam MVARs video,
7 part 4 from the patrol vehicle of Michael Blackwood. This exhibit is being manually
8 lodged. This exhibit is being manually filed.

9 13. “**Exhibit 12**” is a true and correct copy of the dashcam MVARs video,
10 part 2 from the patrol vehicle of Isaiah Kee. This exhibit is being manually lodged.
11 This exhibit is being manually filed.

12 14. “**Exhibit 13**” is a true and correct copy of a cellphone video of the
13 incident taken by witness Betzabeth Gonzalez, authenticated by Ms. Gonzalez at her
14 November 30, 2024 Deposition. This exhibit is being manually lodged. This exhibit
15 is being manually filed.

16 15. Attached hereto as “**Exhibit 14**” is a true and correct copy of the
17 relevant portions of the December 16, 2024 Deposition of Jonathan Wayne Botten,
18 Sr.

19 16. Attached hereto as “**Exhibit 15**” is a true and correct copy of a
20 photograph of the scene, produced in the course of discovery by County Defendants,
21 bates stamped COSB001514.

22 17. Attached hereto as “**Exhibit 16**” is a true and correct copy of a
23 photograph of the white Expedition at the scene, attached as “Exhibit 8” to the
24 deposition of Jake Adams.

25 18. Attached hereto as “**Exhibit 17**” is a true and correct copy of the
26 relevant portions of the January 2, 2025 Deposition of Robert Ripley.

27 19. Attached hereto as “**Exhibit 18**” is a true and correct copy of the
28 relevant portions of the January 2, 2025 Deposition of Timothy Jong, M.D.

20. Attached hereto as “**Exhibit 19**” is a true and correct copy of the of a photograph of Hector Puga’s hands, taken at the scene after the incident. This photograph was produced during the course of discovery by County Defendants, bates stamped COSB001692.

21. Attached hereto as “**Exhibit 20**” is a true and correct copy of the relevant portions of the transcribed February 22, 2021 Interview of Isaiah Kee. This exhibit is subject to a stipulated protective order and is being conditionally lodged under seal.


22. Attached hereto as “**Exhibit 21**” is a true and correct copy of the relevant portions of the December 11, 2024 Deposition of Maria Cadena.

23. Attached hereto as “**Exhibit 22**” is a true and correct copy of the relevant portions of the December 19, 2024 Deposition of Gabriela Salas.

24. Attached hereto as “**Exhibit 23**” is a true and correct copy of the relevant portions of the December 11, 2024 Deposition of Jasmine Hernandez.

25. Attached hereto as “**Exhibit 24**” is a true and correct copy of the Plaintiffs’ police practices expert Roger Clark’s Rule 26 Expert Report, which was exchanged with Defendants as part of Plaintiffs’ Initial Expert Disclosures on January 30, 2025.

I declare under penalty of perjury under the laws of the State of California and the United States of America that the foregoing is true and correct. Executed this 27th day of February 2025, in Los Angeles, California.



Hang D. Le